

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

KAJEET, INC.

Plaintiff,

v.

TREND MICRO, INC.,

Defendant.

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CASE NO. 6:21-CV-389

JURY TRIAL REQUESTED

**DECLARATION OF IAN GRUTZE IN SUPPORT OF
DEFENDANT'S MOTION TO TRANSFER VENUE**

I, Ian Grutze, declare under penalty of perjury as follows:

1. I am currently employed as a Senior Product Manager with Trend Micro, Inc. ("Trend Micro"). I declare that the following statements are true to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances. If called upon to testify, I could and would competently testify thereto.

2. I submit this declaration in support of Trend Micro's Motion for Transfer of Venue in the above-captioned litigation. I have been informed and understand that, in the litigation, Plaintiff Kajeet, Inc. ("Kajeet") has accused Trend Micro of patent infringement and that Kajeet has filed the suit in the Waco Division of the Western District of Texas. I am further informed and understand that the Waco Division of the Western District of Texas includes the following counties: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell.

3. I am informed and understand that Kajeet's Complaint focuses on Trend Micro's Premium Security Suite, Maximum Security, Internet Security, and Mobile Security products (collectively, the "Accused Products"). Complaint, ¶¶ 21, 38-41.

4. Trend Micro is a California entity with a place of business in San Jose, California, which is located in the Northern District of California. Trend Micro has been located in the San Jose area since roughly 1994, and has remained there ever since.

5. As of today, Trend Micro's San Jose office is dedicated to U.S. and global marketing and advertising for its consumer-based products, including the Accused Products. It is highly likely that one or more of these individuals will be designated as fact and/or corporate witnesses pursuant to Federal Rule of Civil Procedure 30(b)(6) to testify concerning topics relating to the Accused Products.

6. Trend Micro maintains another office in Taipei, Taiwan, which employs approximately over 1,000 people. Individuals with relevant knowledge relating to the research, development and operation of the Accused Products are located in the Taipei office. It is highly likely that one or more of these individuals will be designated as fact and/or corporate witnesses pursuant to Federal Rule of Civil Procedure 30(b)(6) to testify concerning topics relating to the Accused Products. Documents relating to the research, design, and development of the Accused Products will likely be collected from the Taipei office.

7. Trend Micro maintains another place of business in Austin, Texas. As of today, the Austin office has approximately 140 employees. It is highly unlikely that any of Trend Micro's Austin employees will be designated as fact or corporate witnesses pursuant to Federal Rule of Civil Procedure 30(b)(6). It is also unlikely that any relevant documents are maintained in the Austin office.

8. Trend Micro maintains a U.S. global headquarters in Irving, Texas. Individuals with relevant knowledge relating to the sales of the Accused Products are located there. Documents relating to the sales and financials concerning the Accused Products will likely be collected from the Irving office.

9. Trend Micro does not maintain any facilities or operations in the Waco Division of the Western District of Texas. I am not aware of any employees with knowledge of the matters relevant to the Accused Products that work or reside in the Waco Division.


10. As of today, the U.S. and foreign based individuals who may have relevant information relating to the Accused Products are located in San Jose, California, Irving, Texas, and Taipei, Taiwan.

11. The documentation and information concerning the design, development, sales, marketing, other financials, as well as other relevant Micro Trend documents, will likely be collected from its San Jose or Taipei office. Accordingly, all of the source code, legacy source code, and back-up source code, can be made available at the San Jose office.

12. To the extent that foreign witnesses are required to travel to the U.S. to testify at a deposition or trial, it will be more convenient for them to travel to San Jose, California or Austin, Texas, locations where Trend Micro has a physical presence. Trend Micro can easily make its witnesses available for depositions at either of these offices.

13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August _9_, 2021

DocuSigned by:

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Ian Grutze
Senior Project Manager
Trend Micro, Inc.